



# *The Commonwealth of Massachusetts*

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May 29, 2003

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS  
ON THE  
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Gloucester Wind Turbine Generators  
PROJECT MUNICIPALITY : Ipswich, Essex, and Gloucester  
PROJECT WATERSHED : offshore state waters (Ipswich Bay)  
EOEA NUMBER : 12995  
PROJECT PROPONENT : Winergy LLC  
DATE NOTICED IN MONITOR : March 25, 2003

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.03 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of an Environmental Impact Report (EIR).

Offshore Renewable Energy and Coastal Development

I strongly support the development of renewable energy in the Commonwealth, and I firmly believe that an ambitious program of renewable energy development is in the interests of the people of Massachusetts. At a global level, the potential for climate change, global climate disruption, and rapid sea level rise dictate the need for alternatives to hydrocarbon combustion as a primary source of energy. At a regional level, development of a thriving renewable market will help diversify New England's energy mix, improve regional air quality, and create a hedge against price fluctuations in gas and oil prices. At a state level, development of renewable energy will set Massachusetts in a leadership role in an emerging market, and will ensure compliance with the Commonwealth's renewable energy portfolio standards (M.G.L. c. 25A S 11F and 225 CMR 14.00).

Wind power has emerged as the most promising source of renewable energy for the foreseeable future. In Massachusetts, the most

promising areas for development of wind power lie primarily off the coast, often in areas recognized for their scenic beauty and value for fisheries, wildlife habitat, and other resources. Despite my strong support for renewable energy, I also have concerns with the current ad hoc system for permitting and development of offshore renewable energy. The recent proliferation of proposed wind farms off the coast, as well as numerous proposed pipelines, electrical lines, fiber-optic cables, off shore sand mining, and the potential for aquaculture development has served to focus attention on the need for a systematic approach to balancing the competing demands on coastal resources. The current approach is reactive and conducted largely on a project-by-project basis. It is time to develop a proactive approach that balances benefits and costs of development, ensures preservation of critical resources, furthers the people's interests in the lands held in public trust, and allows for thoughtful development of coastal resources consistent with state environmental and energy goals.

To develop such a comprehensive, proactive approach to coastal development and preservation, Governor Romney announced the Massachusetts Ocean Management Initiative (MOMI) in March 2003. The centerpiece of MOMI will be the Ocean Management Task Force (OMTF), which I announced in April 2003 and which will soon begin its deliberations. The OMTF will take an integrated approach to ocean management, and will seek advice from regulated parties, government agencies, advocacy groups, and members of the general public on how to best balance the need for conservation of coastal resources with the pressing need for rational development of coastal resources for renewable energy infrastructure, gas transmission pipelines, aquaculture, and traditional uses. The OMTF will make recommendations on changes to existing statutes and regulations to better balance the Commonwealth's twin goals of conservation and responsible development. The OMTF will meet later this year, and will submit its recommendations by early 2004.

However pressing the need for reform of coastal regulations may be, the Gloucester Wind Turbine Generator project, as all other proposed developments, must be reviewed within the context of existing regulations. The review of the Environmental Notification Form (ENF) has left many questions unanswered about project alternatives, impacts, and mitigation. I am requiring the preparation of an EIR to address the outstanding environmental issues; to allow the public full opportunity for input into the project review; and to provide a forum in which information can

be developed and presented to aid in the state permitting process.

### Project Description

As described in the Environmental Notification Form (ENF), the proposed project involves development of approximately ten 1.8 megawatt (MW) wind turbine generators (WTGs) arranged in a line approximately four miles in length in Ipswich Bay; associated submarine cables for interconnection of the WTGs; and a submarine cable to provide an interconnection to the onshore electric distribution system. The project is located wholly within the Commonwealth or its Territorial Sea. The proponent has submitted several other ENFs simultaneously with the proposed project in Ipswich Bay. In separate decisions issued today, I have required the preparation of EIRs for similar 10-turbine projects off the coasts of Falmouth and Truro. The proponent has also proposed several large wind farms in federal waters (with interconnecting cables through state waters) off the south and east coasts of Nantucket. The review of the projects in federal waters is ongoing, and I anticipate issuing Certificates for these projects in the near future.

### Standard, Purpose, and Timing of MEPA Review

By any reckoning, the proposed project has generated significant public interest. The Executive Office of Environmental Affairs and the United States Army Corps of Engineers have held six joint scoping meetings on the Winergy LLC proposals. I have received hundreds of letters on the various proposed projects, and received hundreds of pages of transcribed testimony from the six scoping meetings.

Many commenters have stated their opposition to the proposed Ipswich Bay project and requested that I deny the Ipswich Bay project because of potential impacts on the bay. Under MEPA, I do not have the authority to approve or deny the project. As part of the MEPA process, I will not make substantive judgments as to the proposed use of Ipswich Bay. MEPA is not a zoning process, nor is it a permitting process. Rather, it is a process designed to ensure public participation in the state environmental permitting process, to ensure that state permitting agencies have adequate information on which to base their permit decisions and their Section 61 Findings, and to ensure that potential environmental impacts are described fully and avoided, minimized, and mitigated to the maximum feasible extent.

Other commenters have asked that I decline to review proposed offshore wind farm proposals until such time as a comprehensive system is in place for evaluating the merits of offshore wind development. As discussed above, the Massachusetts Ocean management Initiative (MOMI) and Ocean Management Task Force (OMTF) will provide such a comprehensive framework. However, I cannot legally impose any delay or moratorium on the review of any project pending development of additional regulations. When I receive an ENF, I must issue a finding on it in the form of a Certificate within a tightly prescribed statutory deadline. In this case, the amount of study that will be required should ensure that the OMTF has issued its recommendations prior to the Draft EIR for the project undergoing MEPA review. However, the proponent has the right to submit a Draft EIR before any statutory or regulatory changes take place. The proponent assumes any risks that the basic legal framework around the project will change during the course of the review process. I therefore strongly encourage the proponent to delay submission of the Draft EIR until after the OMTF has concluded its work.

#### Permits and Jurisdiction

The project is undergoing review and requires the preparation of an EIR pursuant to Section 11.03 (3)(a)5. of the MEPA regulations, because the project involves the non water-dependent use of more than an acre of tidelands. The project also triggers review thresholds related to the electric transmission line (see 301 CMR 11.03(7)(b)4.). The project will require a Chapter 91 License and a Chapter 91 Variance from the Department of Environmental Protection (DEP); a Section 401 Water Quality Certificate from DEP; Orders of Conditions from the Ipswich, Essex, and/or Gloucester Conservation Commissions (it is unclear from the ENF in exactly which town(s) the project is located), and hence a Superseding Order from DEP in the event of an appeal; Consistency Review by the Massachusetts Coastal Zone Management Office; review by the Massachusetts Historical Commission; approval by the Massachusetts Energy Facilities Siting Board; and permits from the United States Army Corps of Engineers pursuant to Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act.

The proponent is not seeking financial assistance from the Commonwealth for the project. MEPA jurisdiction therefore extends to those aspects of the project that are within the subject matter of required or potentially required state permits and that have the potential to cause significant Damage to the Environment as defined in the MEPA statute. In this case, broad

subject matter of the Chapter 91 License effectively confers full scope MEPA jurisdiction over the project.

### Coordinated Review

The project is undergoing review pursuant to the National Environmental Policy Act (NEPA), in a process that could lead to the requirement to prepare an Environmental Impact Statement (EIS). In the event that the United States Army Corps of Engineers requires an EIS, the proponent has committed to filing one set of documents that fulfills the requirements of both NEPA and MEPA. Both NEPA and MEPA regulations allow (and encourage) the preparation of joint EIS/EIR documents. I believe coordinated review makes sense, both in terms of allowing for maximum public and agency understanding of the project and to ensure that review by regulatory agencies is as efficient as possible. I will therefore allow the preparation of a joint EIS/EIR for the proposed project, if the Army Corps requires an EIS. I have written this Certificate to harmonize the state requirements with potential federal requirements to the maximum feasible extent.

### Content of the ENF

Many comments have expressed frustration with the lack of information contained in the ENF, especially for a precedent-setting proposed development such as proposed wind farms in state waters. The ENF contains only the barest details of the project and its potential impacts, and contains several factual errors. In addition, a representative of the proponent has publicly stated that the proponent knows little about electricity generation and supply. Against such a backdrop, the scope that follows is necessarily broad in its approach to the review of the proposed project. I anticipate the need for follow-up discussions with permitting agencies and technical experts both inside and outside of government to flesh out the details of the required environmental studies. I reserve the right to provide additional guidance to the proponent on the outline, content, and level of analysis in the EIR as the review process moves forward.

### **SCOPE**

#### General

The EIR should follow the general guidance for outline and content contained in Section 11.07 of the MEPA regulations as modified by this Certificate. Because of the potential for

coordinated review, I will allow the proponent some flexibility in data presentation. The EIR should contain a copy of this Certificate, and a copy of each comment letter received, as listed at the end of this Certificate.

### Alternatives

The EIR should evaluate the no-build alternative to establish baseline conditions. The EIR should also evaluate the proponent's other proposed alternative locations off Falmouth and Truro. The EIR should contain a screening analysis of other potential sites, including sites on the Massachusetts mainland. The screening analysis should include factors such as available land or watershed area, wind field strength, proximity to and likely effect on important environmental resources, regulatory constraints, and potential conflicts with existing uses (such as shipping, commercial and recreational fishing, and aviation).

The EIR should contain more detailed study of the inland or coastal sites that are found to pass the screening analysis. The EIR should contain sufficient information to understand why the proponent has chosen Ipswich Bay and why other sites were deemed infeasible for this particular project. The EIR should contain any alternatives necessary for CZM to conduct its Consistency Review and to determine coastal dependency. The EIR should include any alternatives analysis necessary for DEP to conduct its Section 401 and Chapter 91 reviews. If applicable, the EIR should also include any alternatives deemed necessary for study by the federal government as part of the NEPA review.

Clearly, traditional methods of electricity generation are technically feasible alternatives (as evidenced by my recent reviews of several large gas-fired power plants on the Massachusetts mainland). The viability of gas fired electricity production is sufficiently demonstrated so as to warrant inclusion in the alternatives analysis. Note that I am not suggesting it is necessarily appropriate to require selection of an 18 MW traditional facility on the mainland as the preferred alternative, simply that it is appropriate to study the environmental impacts of such an alternative during the EIR process. The point of the EIR alternatives analysis will be to vary the project parameters of reasonably feasible alternatives to disclose relative impacts so that the general public and state agencies can be informed of relative impacts. (An analysis of feasible alternatives will also prove necessary for CZM to make a determination regarding "coastal dependency.")

The EIR should therefore contain a "generic" analysis for a mainland power plant with a capacity of 18 MW, to determine such parameters as air emissions, water use, fisheries, avian, visual, and other environmental impacts. The generic discussion should include a coastal example as well as an inland example. For comparative purposes, the EIR should also discuss the air emissions from a variety of feasible fuel sources for the 18 MW facility.

The EIR should include an analysis of alternative routes for the submarine and underground cables. The analysis should demonstrate that the cable routing minimizes impacts on benthic resources, water quality, submerged aquatic vegetation, and the shoreline environment at the landfall site. The EIR should evaluate alternatives to the proposed use of jet plow technology for embedding the cables. The EIR should also demonstrate that the overland route generally minimizes impacts, particularly construction impacts on wetlands and sensitive receptors along the route.

The proposed project currently consists of a straight line of regularly spaced wind turbines roughly parallel to the coast. The EIR should investigate alternative configurations for the wind farm and alternative orientations relative to the coastline, in an effort to minimize visual impacts.

#### Cumulative Impacts

The proponent has filed for three relatively small wind farms in state waters, and four large wind farms in federal waters off Nantucket (a representative of the proponent has stated that the proponent initially intends to develop only one wind farm in state waters and one in federal waters). The EIR should examine the potential for cumulative impacts from the various Winergy proposals, and should demonstrate that the proponent has taken steps to feasibly minimize cumulative impacts, as required by the MEPA regulations.

#### Permitting and Planning Consistency

The EIR should include a brief discussion of each state permit or agency action required for the project. The EIR should demonstrate that the project could meet any applicable performance standards or otherwise merit a variance from any applicable regulations.

The project could help fulfill an important goal of the 1997 Electric Utility Industry Restructuring Act (Chapter 164 of the Acts of 1997) by contributing to the Commonwealth's ability to meet its renewable portfolio standard. The EIR should briefly address the goals and requirements of this landmark legislation. The EIR should also address consistency with other state policies concerning energy and sustainability, including the provisions of Executive Order 385 (Planning for Growth). The EIR should also discuss consistency with any local or regional open space or growth plans.

### Project Feasibility

The project review by the Energy Facilities Siting Board will include analysis of such factors as the need for the transmission line, alternatives, route selection, cost, environmental impacts, and reliability. (Unlike any other state review process, the EFSB review may proceed prior to completion of the MEPA review.) The EIR should include an analysis of electrical and technical feasibility issues. If the EFSB review precedes MEPA review, I encourage the proponent to include a summary of the EFSB process and findings in the EIR to meet this informational requirement. The Independent System Operator-New England (ISO-NE) would review the proposed interconnection to the grid, to determine the impact of the additional generation on local and regional transmissions systems; to determine whether any modifications to the transmission system are needed to accommodate the new source; and provide a cost estimate for any necessary modifications. If the ISO-NE studies are available by the time the EIR is published, the EIR should include a summary of key findings.

### Environmental Impacts

The ENF contains almost no information on the potential environmental impacts of the proposed project, and it appears that the proponent has not undertaken any detailed environmental studies of the project area. To ensure that the EIR is founded on adequate information, I strongly recommend that the proponent undertake at least two years of pre-construction data collection on avian, fisheries, benthic, and wildlife impacts.

### Visual

The visual impacts of the project have been mentioned more than any other issue among comments received. The EIR should include visual simulations of the appearance of the WTGs from vantage points in Ipswich, Essex, Gloucester, Newbury, and Newburyport



that are sufficiently well spaced and geographically representative of the project area to capture a good sense of the overall visual impacts of the project. The visual simulations should include vantages from residential areas, historic sites, and public open spaces. I reserve the right to make more specific requirements for visual simulations as the review process progresses. The EIR should include in an appendix any information necessary to ensure that the methodology for pictorial representation is transparent.

The EIR should also include an analysis of visual impacts from lighting. The EIR should discuss any federal lighting requirements (particularly requirements of the Federal Aviation Administration and United States Coast Guard). The EIR should also discuss whether any flexibility exists in terms of lighting colors, intensity, orientation, and/or flash frequency and duration. The EIR should evaluate any trade-offs between safety considerations (both to boaters and to airplanes), avian impacts, and visual impacts on Massachusetts landforms.

#### Noise

The EIR should include an analysis of noise impacts from the project. The EIR should analyze whether noise from the project (as measured on the A-weighted scale and by octave bands) will be measurable above background noise from the nearest representative locations along the coasts of Ipswich, Essex, and Gloucester. The EIR should also model noise impacts as measured from the base of the monopiles. The EIR should also address the ability of the project to meet the performance standards contained in the DEP Noise Policy (DAQC Policy 90-001).

The EIR should also evaluate the potential impacts of underwater noise and vibrations from the WTG array, with analysis of potential biological and ecological effects from a change in the noise environment.

#### Avian Impacts

The EIR should include a thorough assessment of impacts to birds. The EIR should focus on impacts to three categories of birds: migratory songbirds, wintering seaducks, and rare and endangered birds including Roseate and Common Terns and Piping Plovers.<sup>1</sup>

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<sup>1</sup> The Roseate Tern is endangered at both the state and federal level. The Piping Plover is threatened at both the state and federal level. The Common Tern is a state Species of Special Concern.

The EIR should address collision hazards and habitat alteration impacts. If the proponent prepares a formal risk assessment, any subjective inputs should be clearly identified and appropriate sensitivity analyses included.

The EIR should present as much pre-construction data as possible on the spatial and temporal characteristics of avian activity in the project area. The EIR should also present enough information on other alternatives studied to enable a meaningful comparison of impacts among the alternatives studied (I recognize that full-scale long-term study of all potential alternative sites may not prove feasible).

The EIR should address the potential for heightened mortality from unusual events, such as storms. The EIR should develop potential methods of assessing impacts from such events, and consider a range of management responses to reduce bird mortality.

The EIR should also assess impacts to birds from lighting of the WTG array. The EIR should develop a monitoring plan to gauge impacts post-construction, and develop appropriate action thresholds and mitigation if monitoring reveals a problem.

#### Fisheries Impacts

The EIR should include an assessment of impacts on fisheries (both commercial and recreational), with particular focus on potential impacts to fisheries habitat. The EIR should also assess potential indirect impacts caused by changes in water movement and sediment transport from placement of the WTG monopiles. The EIR should disclose whether armoring is proposed at the base of monopiles, and should evaluate potential impacts (both positive and negative) from the introduction of these "artificial reefs" in the project area.

The EIR should describe existing habitat conditions in the project area, and should identify fish species and types expected to occur in the project area. The EIR should also describe the temporal characteristics of the species present (i.e., what life stages of the various species are likely to be encountered, and at what times of year). The EIR should evaluate the potential impacts of the WTG array and associated cables (construction, operation, and maintenance) on benthic habitat and species composition and relative abundance in the project area. This

analysis should include any impacts related to specific life stages of affected species.

#### Rare Species

The EIR should evaluate potential impacts on any state or federally listed rare or endangered species. The EIR should contain sufficient information for the Division of Fisheries and Wildlife to determine whether the project would result in the "take" of any protected species.

#### Marine Mammals

The EIR should evaluate potential impacts of the project on marine mammals, including any species of whale known to traverse the project area, and the Grey Seal, a Massachusetts Species of Special Concern.

#### Land Alteration

The EIR should quantify the amount of land disturbed, both land under water/salt marsh, and uplands/inland wetlands. The EIR should discuss the resources present in lands proposed for alteration, including benthic resources, archaeological resources, and vegetation.

#### Wetlands/Drainage

The EIR should include a reasonably scaled map that delineates wetland boundaries and buffer zones present in the project area. The plans should also note any applicable local buffer zone requirements. The EIR should explain the significance of each wetland area to the interests enumerated in the Wetlands Protection Act. For each alternative, the EIR should quantify the amount of direct wetland alterations proposed. The EIR should include a demonstration that the proposed routing avoids or minimizes impacts to eelgrass beds and other submerged aquatic vegetation.

#### Water Quality

The EIR should address the water quality impacts of the project, including impacts from the proposed jet plow method of embedding the submarine cables. The EIR should also discuss impacts at the land fall site, and the feasibility of horizontal directional drilling in this area to minimize impacts. The EIR should also

address any informational requirements of the Water Quality Certification process.

#### Chapter 91/Public Trust

DEP has determined that the project is a non water-dependent use of tidelands, and will therefore require a variance from M.G.L. Chapter 91 and 310 CMR 9.00. The EIR should address the standards and requirements of the variance process specified at 310 CMR 9.21. The EIR should include the following information to aid in this determination:

1. The specific regulatory provisions from which the proponent will seek variances;
2. Alternative designs, locations, or construction methods that would allow the project to proceed without a variance (the EIR should also explain why these alternatives are unreasonable);
3. The detriments to public interests in waterways due to the project, and proposed means by which the proponent will minimize these impacts;
4. Proposed measures to compensate for any remaining detriments to public interests in waterways; and
5. The overriding public interest served by the project, with provision of adequate supporting documentation.

The EIR should also address the standards for non water-dependent infrastructure facilities at 310 CMR 9.55, including analysis of impacts to maritime commerce, industry, recreation, and associated public access; living marine resources and water quality; and public views, visual quality of the shoreline environment, and historic and cultural resources near waterways.

#### Ocean Sanctuaries Act

The proposed project is located within the boundaries of the North Shore Ocean Sanctuary, established pursuant to the Massachusetts Ocean Sanctuaries Act (M.G.L. Ch. 132A S 13-16 and 18, and 313 CMR 5.00). Section 15 of the Act prohibits the building of any structure on the seabed or under the subsoil, and prohibits the construction of offshore electrical facilities. However, section 16 of the Act allows an exemption for such facilities within the North Shore Ocean Sanctuary if the project can meet the other environmental requirements of the Act. Since the project requires a Chapter 91 License, the proponent may obtain an exemption under section 16, provided that the proponent demonstrates that the project:

1. Meets the six factors of the Act's Public Necessity and Convenience requirements (see 302 CMR 5.04 and 5.08(4));
2. Receives applicable permitting approvals from the United States Army Corps of Engineers;
3. Obtains all other certificates, licenses, permits and approvals required by law; and
4. Will not be undertaken or located except in compliance with any general or special statutes, rules, regulations, or orders.

The EIR should include the information necessary to evaluate compliance with the applicable provisions of the Ocean Sanctuaries Act. Much of the information necessary to determine compliance, as explained in the comment from the Department of Environmental Management, will be required elsewhere in the EIR. The Section of the EIR on the Ocean Sanctuaries Act need not duplicate analysis conducted elsewhere in the EIR, but the section should include appropriate cross references to applicable technical analysis located in other sections of the document.

#### Federal Consistency

The EIR should address the concerns of CZM raised in the applicable comment letters, and provide sufficient information to facilitate the federal Consistency Review. The EIR should also address the applicable specific policies of the Massachusetts Coastal Zone Management Plan, including Habitat Policy #1; Coastal Hazard Policies #1 and #2; and Public Access Policy #1.

#### Historic/Archaeological Impacts

The EIR should assess visual impacts on the various historic districts and properties in the project viewshed. In addition, the EIR should evaluate any impacts on historic resources along any overland cable routes.

Underwater areas of the proponent's preferred project area have high sensitivity for archaeological resources. The EIR should analyze potential impacts on underwater archaeological resources (both shipwrecks and now-submerged prehistoric cultural artifacts). I strongly recommend that the proponent consult with MHC and the Massachusetts Board of Underwater Archaeological Resources to develop an appropriate scope for these studies.

Decommissioning Plan

The EIR should include a plan to remove the turbines, towers, cables, and other infrastructure in the event that the project ceases operation. The EIR should discuss the funding mechanism for the decommissioning plan, and should outline the steps that would be taken to ensure minimization of environmental impacts during removal of structures.

Construction Period

The EIR should include an analysis of construction period impacts, including impacts at the landfall site and impacts associated with the proposed jet plow trenching method. The EIR should address construction impacts from the overland route as well, and address whether any work will be required within a state highway layout.

Comprehensive Environmental Monitoring Program

Given the project's uniqueness, a considerable degree of uncertainty exists surrounding project impacts post-construction. To obtain meaningful data on impacts (and to aid in potential future environmental reviews of offshore WTG arrays both here and elsewhere), the EIR should outline a Comprehensive Environmental Monitoring Program (CEMP). For a good recent example of the structure and goals of a CEMP, I refer the proponent to the CEMP for the Maritimes/Hubline Project (EOEA #12355).

Comments and Circulation

The EIR should include a copy of each comment received. The EIR should respond to the substantive comments received. The proponent should circulate a hard copy of the EIR to each state agency from which the proponent will seek permits or approvals. The proponent should also circulate a copy of the EIR to those submitting written comments, for which addresses are available. I have treated the comments received on the five separate Winergy LLC ENFs as one set of comments, since issues of alternatives and cumulative impacts will necessarily overlap to a great extent.

To save paper and other resources, I will allow the proponent to circulate the EIR in CD-ROM or similar format to individual commenters, although the proponent should make available a reasonable number of hard copies available on a first come, first served basis, to accommodate those without convenient access to a computer. The proponent should also make available hard copies

of the EIR in the public libraries of Ipswich, Essex, and Gloucester.

Mitigation

The EIR should include a summary of all mitigation measures to which the proponent has committed. The mitigation summary should serve to form the basis of the proposed Section 61 Finding to be presented in the Final EIR.

May 29, 2003

Date

  
Ellen Roy Herzfelder

Comments Received (continues on following pages):

03/27/03 Robert McLaughlin Sr.  
03/28/03 The Coalition for Buzzards Bay  
04/02/03 Frederick Smith  
04/03/03 Kathleen Taylor  
04/03/03 William Murphy and Jane Zises  
04/03/03 Anne Sawyer  
04/04/03 Bonnie Simon  
04/04/03 Joshua Bernstein  
04/04/03 Stephen Simon  
04/07/03 Mrs. H. Henoyan  
04/07/03 Carol Rasic  
04/07/03 J. Randall and Lynn Evans  
04/10/03 Mary Makela  
04/10/03 Lon Bonczek  
04/10/03 Thomas Stenberg  
04/10/03 Massachusetts Aeronautics Commission  
04/11/03 Kathleen Tillery  
04/11/03 St. George Tucker Aufranc  
04/11/03 William Levy  
04/14/03 Bob Dunbar  
04/14/03 Weatherly Dorris  
04/14/03 Gary and Carmen Grainger  
04/14/03 William Sawyer  
04/15/03 Rutherford Ellis  
04/15/03 Transcribed comments from MEPA/USACE public meeting,  
Falmouth MA  
04/16/03 Society for the Preservation of New England Antiquities  
04/16/03 William Saltonstall

04/16/03 Samuel Gray  
04/16/03 E. Kent Swift  
04/16/03 Ken Molloy  
04/17/03 Transcribed comments from MEPA/USACE public meeting,  
Essex MA  
04/18/03 Jim Berry (with attachment)  
04/18/03 Mark Burns  
04/22/03 Mayor John Bell, City of Gloucester  
04/22/03 Transcribed comments from MEPA/USACE public meeting,  
Provincetown MA  
04/23/03 Stephen Sawyer  
04/23/03 Sandro Segalini  
04/23/03 Michael Taylor  
04/24/03 Massachusetts Highway Department (3)  
04/24/03 Marianna Martini  
04/24/03 Renee Caggiano  
04/25/03 Peter Phippen  
04/25/03 Jann Leeming and Arthur Little  
04/25/03 Frank and Donna Brown  
04/25/03 William von Rosenvinge  
04/28/03 Transcribed comments from USACE/MEPA public meeting #1,  
Nantucket MA  
04/28/03 Rob Reynolds  
04/28/03 Ted and Eileen Burt  
04/28/03 Rebekah Gardiner  
04/28/03 Herb Dean  
04/28/03 C. David Burt  
04/29/03 Transcribed comments from USACE/MEPA public meeting #2,  
Nantucket MA  
04/29/03 Donald Dood  
04/29/03 Joan Maloney  
04/29/03 Thomas and Virginia Dabney  
04/29/03 John Sebestyen  
04/29/03 G.L. Cross  
04/29/03 James Maloney  
04/29/03 George Bennett  
04/29/03 Margaret Flanagan  
04/29/03 Carol McMahon  
04/29/03 Julie McMahon  
04/29/03 Maurice Gibbs  
04/30/03 Carolyn Dain  
04/30/03 Joanne Eldred  
04/30/03 Kathleen Cibotti  
04/30/03 Emmett Eldred  
05/01/03 Transcribed comments from USACE/MEPA public meeting,  
Boston MA  
05/01/03 Peter Summers



05/01/03 Paul Miller and Louis Finnegan  
05/01/03 Charles and Charlotte Goodwin  
05/01/03 Mitchell and Leslie Cohen  
05/01/03 Charles Bacon  
05/01/03 George Fontaine  
05/01/03 Norman Feintuex  
05/01/03 Holmes and Mcgrath Inc.  
05/02/03 Lois Bernstein  
05/02/03 Lawrence Fish  
05/02/03 Marcia Due  
05/02/03 William Gundy  
05/02/03 James Ho  
05/02/03 Jennie Brown  
05/02/03 John Berg  
05/02/03 Patty Frost  
05/05/03 David Bakalar  
05/05/03 Jodi Smith  
05/05/03 Thomas Marston  
05/05/03 Edward Igo  
05/05/03 Nancy Shaw  
05/05/03 Jann Taylor  
05/05/03 Millbury family (by Gargiulo/Rudnick)  
05/05/03 Richard and Priscilla McElvein  
05/05/03 Michael Follick  
05/05/03 William Dugan  
05/05/03 Martha Patrick  
05/05/03 Caroline Bacon  
05/05/03 Caroline Balz  
05/05/03 Allan Dragone  
05/05/03 Falmouth Conservation Commission  
05/05/03 Frederick Smith  
05/06/03 Alex McKenzie  
05/06/03 Elizabeth Driscoll  
05/06/03 Elizabeth Soli  
05/07/03 Quintus Farrell  
05/07/03 Michael Fenlon  
05/07/03 Carlo Zezza  
05/07/03 Northland Residential Corporation (F. Stewart)  
05/07/03 Nina Webber  
05/07/03 David Barry  
05/08/03 Robert Driscoll  
05/08/03 Keith and Peggy Krewson  
05/08/03 Charles Klotz  
05/08/03 Elfriede Collis  
05/08/03 James Coughlin  
05/08/03 The Trustees of Reservations  
05/08/03 Mary Alice Wheeler

05/08/03 Martha Price  
05/08/03 Susan Moran  
05/08/03 Charles Yassky  
05/08/03 Representative Eric Turkington  
05/09/03 Cynthia Allen  
05/09/03 William Allen  
05/09/03 Thomas Allen  
05/09/03 Carl Borchert  
05/09/03 Kathleen Taylor  
05/09/03 William Jones Jr.  
05/09/03 Paula Gillis and Edward Richards  
05/09/03 Edmund Merriam  
05/09/03 Christopher and Elizabeth Olsen  
05/09/03 Richard Hammel  
05/09/03 Gerald Weissmann  
05/09/03 Division of Fisheries and Wildlife  
05/09/03 Edward Goldstein  
05/09/03 Joseph and Elizabeth Cook  
05/09/03 Holly Hanoyan  
05/09/03 Linda and Bernie Grubstein  
05/09/03 Sheila and Bob Goldstein  
05/09/03 Vera Clark  
05/09/03 Richard Shriner  
05/09/03 Chris Eastland  
05/09/03 Barbara and Mike Fine  
05/09/03 Elizabeth Bolton  
05/12/09 Deborah Beers  
05/12/03 Pamela Truesdale  
05/12/03 Lynn Hodgson  
05/12/03 H. William Fleming  
05/12/03 Paul and Heather Farrell  
05/12/03 Barbara Furie  
05/12/03 Frances MacKay  
05/13/03 Susan Edson  
05/13/03 David Varsano and Jill Goldstein  
05/13/03 Charmaine Blanchard  
05/13/03 Margaret Jewett Greer  
05/13/03 Anne Kronenberg  
05/13/03 Jeanette Sacchini  
05/13/03 William Hastings  
05/13/03 Paul and Patricia Hogan  
05/13/03 Joanne Holdgate  
05/13/03 Sam Farrell  
05/13/03 Elizabeth Foley  
05/13/03 Michael & Pamela Ryan  
05/13/03 Todd Dagres  
05/13/03 Nina Whitney

05/13/03 Paul Decoulos  
05/13/03 Wingaersheek Improvement Association (J. Brown)  
05/13/03 Senator Robert O'Leary  
05/13/03 Marcia Copel  
05/13/03 David Hill  
05/13/03 Katherine Scott  
05/13/03 Councillor Christine Rasmussen, City of Gloucester  
05/13/03 Pauline Farrell  
05/13/03 Herbert Gutterson  
05/13/03 Jeanne Jikanowski  
05/13/03 Thomas Jehl  
05/13/03 Nancy Pendleton  
05/13/03 Lois Glavin  
05/13/03 Elizabeth Sanford  
05/13/03 Sonya Driscoll  
05/13/03 Cynthia and John Coffin  
05/13/03 Jean Hemstreet  
05/13/03 James Clark Jr.  
05/13/03 Barbara Billings  
05/13/03 Stephen Jelin  
05/13/03 Rose Wagner  
05/13/03 Rene Conrad  
05/13/03 George DeMello  
05/13/03 George Smith  
05/13/03 Nanette and Sidney Small  
05/13/03 Sandy Mitchell  
05/13/03 Margot Fraker Wynkoop  
05/13/03 Sebastiano and Susan Rooney Santostefano  
05/13/03 Sharon and John Toulotte  
05/13/03 William and Carolyn Duane  
05/13/03 R. Michael Hans and Beverly Near  
05/13/03 Stephen Billings  
05/14/03 John and Catherine Mandile  
05/14/03 Michael and Agnese Meehan  
05/14/03 Anne Warhover  
05/14/03 Nancy English  
05/14/03 Jonathan and Kathryn Burt  
05/14/03 Peter and Martha Lennon  
05/14/03 Nantucket Planning and Economic Development Commission/  
Nantucket Board of Selectmen  
05/14/03 David and Nancy Babin  
05/14/03 Town of Falmouth (Selectmen and Planning Board) (with  
attachments)  
05/14/03 Thomas and Suzanne Albani  
05/14/03 William Murphy  
05/14/03 Norman Bernstein  
05/14/03 Eileen Surette

05/14/03 Virginia Kuykendall  
05/14/03 Frances McCarthy  
05/14/03 Christopher McLaughlin  
05/14/03 Martha Gruson  
05/14/03 Charles Rickands  
05/14/03 Louis Finnegan and Christina Lewis  
05/14/03 Robert O. Smith  
05/14/03 George Needham  
05/14/03 Corrine McLaughlin  
05/14/03 Kiril Coonley  
05/14/03 Barbara Loring  
05/14/03 Frank Egloff  
05/14/03 Richard Gibbs  
05/14/03 Dana Smith  
05/14/03 James McConnell Clark  
05/14/03 Karin Lebherz Smith  
05/14/03 Douglas Cooper  
05/14/03 Katherine Cooper  
05/14/03 Diana McLaughlin  
05/14/03 Darlene Howell and petitioners  
05/14/03 Barbara Roberts  
05/14/03 Helen Morris  
05/14/03 Elizabeth Skinner  
05/14/03 Marian Ware  
05/14/03 Rosemary Shelburne  
05/14/03 Edward DeWitt  
05/14/03 Quissett Association, Quissett Harbor House Land Trust,  
Quissett Yacht Club, and Quissett Harbor Preservation  
(by Fort Point Associates)  
05/14/03 Robin Singer  
05/14/03 Madeline Eysie  
05/14/03 Frederick Dodge  
05/14/03 Deborah Scanlon  
05/14/03 Chuck Steinman  
05/14/03 Carol Kinsley  
05/14/03 Jim Berry  
05/15/03 Mr. & Mrs. H. Kerner Smith  
05/15/03 Carol Reed  
05/15/03 Carol Reinisch Suitor  
05/15/03 Pasquale DeLeo Jr.  
05/15/03 Damien Kuffler  
05/15/03 Ronald and Linda Denault  
05/15/03 Gerald Cameron Jr.  
05/15/03 Nancy Hayward  
05/15/03 Suzanne Kuffler  
05/15/03 James O'Connor  
05/15/03 Charles Jacobs

05/15/03 Richard and Mary Bronski  
05/15/03 Mary Goldman  
05/15/03 Robert Reynolds  
05/15/03 Cynthia Haigh  
05/15/03 Fay Allister  
05/15/03 Jane Driscoll  
05/15/03 Carol Raisic  
05/15/03 Timothy Fulham  
05/15/03 United States Department of the Interior  
05/15/03 The Learnard Family  
05/15/03 SPD Realty Trust (by Macero & Associates)  
05/15/03 Richard Michaelson  
05/15/03 Gary Perwak  
05/15/03 Christopher Carty  
05/15/03 Eastport Trading Company  
05/15/03 Carol and Howard Crocker  
05/15/03 Ellen Needham  
05/15/03 Town of Ipswich Harbormaster  
05/15/03 Association to Preserve Cape Cod, Inc.  
05/15/03 Martha Carroll Casey  
05/15/03 Thomas Tullius  
05/15/03 Whitney Keen  
05/15/03 Thomas Casey  
05/15/03 Thomas Beddall  
05/15/03 Quamquissett Beach Club  
05/15/03 John and Catherine Mandile  
05/15/03 Daniel and Maria Gallagher  
05/15/03 Mary Reardon  
05/15/03 Kathryn Bradley  
05/15/03 Peter Krogh and Alicia Carol Wullschleger  
05/15/03 Joseph and Helen Ann Dixon  
05/15/03 Carlton and Gladys Grant  
05/15/03 Margaret German  
05/15/03 J.D. Frantz  
05/15/03 Marian Clouse  
05/15/03 Heather Wright  
05/15/03 Glen Beasley  
05/15/03 Robert and Athleen Zimmermann  
05/15/03 William and Kay Dillon Pechilis  
05/15/03 Katherine Stover  
05/15/03 Todd Adelman  
05/15/03 Town of Ipswich Conservation Commission  
05/15/03 Edith Leary  
05/16/03 Holmes and McGrath Inc. (for M. Jewett Greer et al)  
05/16/03 James Mooney  
05/16/03 Allan Taylor  
05/16/03 Joshua Holden

05/16/03 Alliance to Protect Nantucket Sound  
05/16/03 Division of Marine Fisheries  
05/16/03 Robin Surette  
05/16/03 Massachusetts Energy Facilities Siting Board  
05/16/03 Carl Bowin  
05/16/03 Edward Crosby  
05/16/03 Caronccm@aol  
05/16/03 Anita and Don Dickinson  
05/16/03 Massachusetts Division of Energy Resources  
05/16/03 Robert Squires  
05/16/03 Toni Ramos  
05/16/03 MassAudubon  
05/16/03 Cape Cod Commission  
05/16/03 Barbara and Elliot Gewirtz  
05/16/03 Charles Mann  
05/16/03 James Caplan  
05/16/03 William Harding  
05/16/03 Conservation Law Foundation  
05/16/03 Jack E. Robinson  
05/16/03 Dorothy Allen  
05/16/03 Thomas Chamberlin  
05/19/03 Stephen Chalmers  
05/19/03 Humane Society of the United States/International  
Wildlife Coalition  
05/19/03 Joe Uzdavinis  
05/19/03 Barbara Sweenalies  
05/19/03 The Coalition for Buzzards Bay  
05/19/03 Dwight Williams  
05/19/03 George and Marjorie Yost  
05/19/03 William Bradshaw  
05/19/03 Sippewissett Association  
05/19/03 Stephen Ells  
05/19/03 Judith Rowe  
05/19/03 James German  
05/19/03 Peter Crabtree  
05/19/03 Jade Warfield  
05/19/03 Elizabeth Cant  
05/19/03 Mary Jean Howard  
05/19/03 Michael Connor  
05/19/03 Frederick Peters  
05/19/03 James Luft  
05/19/03 Virginia Williams  
05/19/03 William and Glenna Mayer  
05/19/03 Michael McKeen  
05/19/03 Mary McGowan  
05/19/03 D.G. Foulke  
05/19/03 Laura Landrigan

05/19/03 Elizabeth Foley  
05/19/03 Massachusetts Historical Commission (5)  
05/19/03 Lisa Leiden  
05/19/03 Peter Ward  
05/19/03 Gerald Cameron Jr.  
05/19/03 Mark Morris  
05/19/03 Edward Kern  
05/19/03 Scott Robinson  
05/19/03 John Paone  
05/19/03 Vanessa and David Robinson  
05/19/03 Kathlen Tillery  
05/19/03 M. Whitney Kelting  
05/19/03 Lois and Alan Young  
05/19/03 Siasconset Civic Association  
05/19/03 U.S. Department of the Interior, Fish and Wildlife  
Service  
05/19/03 Deborah Ellison and Susan Krupanski  
05/19/03 Gerald Coughlan  
05/19/03 Willie Goldwasser  
05/20/03 Massachusetts Coastal Zone Management Office (5)  
05/20/03 Kathy & Al Kerhshl  
05/20/03 Norma Holmes  
05/20/03 Sally Cross  
05/20/03 Kristen Benedict  
05/20/03 Myra Wrubel  
05/20/03 Massachusetts Board of Underwater Archaeological  
Resources  
05/21/03 Town of Ipswich Waterways Advisory Committee  
05/23/03 Dan and Cheryl Bowman  
05/23/03 Massachusetts Department of Environmental Management  
05/26/03 Massachusetts Department of Environmental Protection  
05/27/03 Paul Decoulos  
05/27/03 Doug and Jane Huzar

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